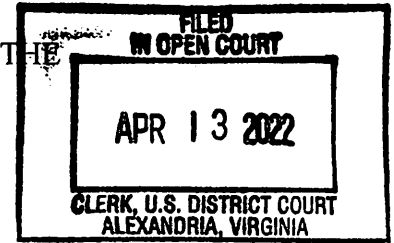


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

PETER LE

JOSEPH DUK-HYUN LAMBORN

TONY MINH LE

YOUNG YOO

*Defendants.*

No. 1:19-cr-57

The Honorable Liam O'Grady

Trial Date: April 11, 2022

**STIPULATIONS CONCERNING  
CONTROLLED SUBSTANCES EXHIBITS**

The United States of America, by Jessica D. Aber, United States Attorney for the Eastern District of Virginia, James L. Trump, Carina A. Cuellar, and Ryan B. Bredemeier, Assistant United States Attorneys and the defendants Peter Le, Joseph Duk-Hyun Lamborn, Tony Minh Le, and Young Yoo, through counsel, for purposes of trial stipulate as required and appropriate to the authenticity, foundation, proper chain of custody, and hearsay exception (Fed. R. Evid. 803 and 807) for the following United States exhibits, testimony, and facts:

1. On or about January 12, 2018, law enforcement obtained approximately two ounces of powder material suspected to be cocaine (Government Exhibit 9-1A). On or about April 30, 2019, the Drug Enforcement Administration's ("DEA") Mid-Atlantic Laboratory in Largo, Maryland, received Government Exhibit 9-1A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-1A.

2. On or about August 21, 2018, law enforcement obtained approximately six

ounces of powder material suspected to be cocaine (Government Exhibit # 9-4A). On or about April 30, 2019, the DEA Mid-Atlantic Laboratory in Largo, Maryland, received Government Exhibit 9-4A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-4A.

3. On or about September 25, 2018, law enforcement obtained approximately three ounces of powder material suspected to be cocaine (Government Exhibit 9-10A). On or about April 30, 2019, the DEA Mid-Atlantic Laboratory in Largo, Maryland, received Government Exhibit 9-10A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-10A.

4. On or about March 15, 2018, law enforcement obtained approximately four ounces of powder material suspected to be cocaine (Government Exhibit 9-2A). On or about April 30, 2019, the DEA Mid-Atlantic Laboratory in Largo, Maryland, received Government Exhibit 9-2A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-2A.

5. On or about May 31, 2018, law enforcement obtained approximately six ounces of powder material suspected to be cocaine (Government Exhibit 9-3A). On or about April 30, 2019, the DEA Mid-Atlantic Laboratory in Largo, Maryland, received Government Exhibit 9-3A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-3A.

6. On or about June 12, 2018, law enforcement obtained approximately three pounds of a green leafy substance suspected to be marijuana (Government Exhibits 9-5A, 9-6A, and 9-7A), as well as an additional approximately 1.5 grams of suspected marijuana (Government Exhibit 9-8A). On or about April 30, 2019, the DEA Mid-Atlantic Laboratory in Largo,

Maryland, received Government Exhibits 9-5A, 9-6A, 9-7A, and 9-8A for analysis. A proper chain of custody was maintained regarding Government Exhibits 9-5A, 9-6A, 9-7A, and 9-8A. On or about July 9, 2019, Forensic Chemist Lauren E. Munoz completed her analysis of Government Exhibits 9-5A, 9-6A, 9-7A, and 9-8A using recognized and reliable methods. The results of the analysis of Exhibit 9-5A are reflected in the Chemical Analysis Report for LIMS Number 2019-SFL3-02683 (Government Exhibit 9-5B), which accurately summarizes Munoz's findings, namely that Government Exhibit 9-5A weighs approximately 443 grams and the substance is marijuana, a Schedule I controlled substance. The results of the analysis of Exhibit 9-6A are reflected in the Chemical Analysis Report for LIMS Number 2019-SFL3-02684 (Government Exhibit 9-6B), which accurately summarizes Munoz's findings, namely that Government Exhibit 9-6A weighs approximately 443 grams and the substance is marijuana, a Schedule I controlled substance. The results of the analysis of Exhibit 9-7A are reflected in the Chemical Analysis Report for LIMS Number 2019-SFL3-02685 (Government Exhibit 9-7B), which accurately summarizes Munoz's findings, namely that Government Exhibit 9-7A weighs approximately 446 grams and the substance is marijuana, a Schedule I controlled substance. The results of the analysis of Exhibit 9-8A are reflected in the Chemical Analysis Report for LIMS Number 2019-SFL3-02686 (Government Exhibit 9-8B), which accurately summarizes Munoz's findings, namely that Government Exhibit 9-8A weighs approximately 1.48 grams and the substance is marijuana, a Schedule I controlled substance.

7. On or about June 12, 2018, law enforcement obtained approximately five ounces of powder material suspected to be cocaine (Government Exhibit 9-9A). On or about June 26, 2018, the DEA Mid-Atlantic Laboratory in Largo, Maryland, received Government Exhibit 9-9A

for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-9A.

On or about July 9, 2018, Forensic Chemist Brian J. Makela completed his analysis of Government Exhibit 9-9A using recognized and reliable methods. The results of that analysis are reflected in the Chemical Analysis Report for LIMS Number 2018-SFL3-03822 (Government Exhibit 9-9B). Government Exhibit 9-9B accurately summarizes Makela's findings, namely that Government Exhibit 9-9A weighs approximately 138.2 grams and contains a detectable amount of Cocaine Hydrochloride, a Schedule II controlled substance.

8. On or about July 24, 2019, law enforcement obtained samples taken from individual marijuana plants, that law enforcement packaged in separate envelopes, at the address of 81 Bass Lane, Hayfork, California. Law enforcement grouped the separate envelopes containing samples of the marijuana plants in groupings of ten envelopes (Government Exhibits 9-18A, 9-19A, 9-20A, 9-21A). On or about August 15, 2019, the DEA Western Laboratory in Pleasanton, California, received Government Exhibits 9-18A, 9-19A, 9-20A, 9-21A for analysis. A proper chain of custody was maintained regarding Government Exhibits 9-18A, 9-19A, 9-20A, 9-21A. On or about May 14, 2020, Forensic Chemist Charmaine X. Qiu completed her analysis of Government Exhibit 9-18A using recognized and reliable methods. On or about May 15, 2020, Forensic Chemist Charmaine X. Qiu completed her analysis of Government Exhibits 9-19A, 9-20A, 9-21A using recognized and reliable methods. The results of the analysis of Exhibit 9-18A are reflected in the Chemical Analysis Report for LIMS Number 2019-SFL7-04240 (Government Exhibit 9-18B), which accurately summarizes Qiu's findings, namely that Government Exhibit 9-18A has a substance net weight of approximately 80.2 grams, the substance is marijuana, a Schedule I controlled substance, and all ten samples are marijuana.

The results of the analysis of Exhibit 9-19A are reflected in the Chemical Analysis Report for LIMS Number 2019-SFL7-04241 (Government Exhibit 9-19B), which accurately summarizes Qiu's findings, namely that Government Exhibit 9-19A has a substance net weight of approximately 40.5 grams, the substance is marijuana, a Schedule I controlled substance, and all ten samples are marijuana. The results of the analysis of Exhibit 9-20A are reflected in the Chemical Analysis Report for LIMS Number 2019-SFL7-04242 (Government Exhibit 9-20B), which accurately summarizes Qiu's findings, namely that Government Exhibit 9-20A has a substance net weight of approximately 64.8 grams, the substance is marijuana, a Schedule I controlled substance, and all ten samples are marijuana. The results of the analysis of Exhibit 9-21A are reflected in the Chemical Analysis Report for LIMS Number 2019-SFL7-04243 (Government Exhibit 9-21B) which accurately summarizes Qiu's findings, namely that Government Exhibit 9-21A has a substance net weight of approximately 20.7 grams, the substance is marijuana, a Schedule I controlled substance, and all ten samples are marijuana.

9. On or about July 24, 2019, law enforcement obtained ten samples taken from individual marijuana plants, that law enforcement packaged in ten separate envelopes (Government Exhibit 9-22A), during at the address of 81 Bass Lane, Hayfork, California. On or about August 15, 2019, the DEA Western Laboratory in Pleasanton, California, received Government Exhibit 9-22A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-22A. On or about May 14, 2020, Forensic Chemist Brittany H. Thomas completed her analysis of Government Exhibit 9-22A using recognized and reliable methods. The results of that analysis are reflected in the Chemical Analysis Report for LIMS Number 2019-SFL7-04244 (Government Exhibit 9-22B). Government Exhibit 9-22B accurately

summarizes Thomas's findings, namely that Government Exhibit 9-22A has a substance net weight of approximately 59.5 grams, the substance is marijuana, a Schedule I controlled substance, and all ten samples are marijuana.

10. On or about July 24, 2019, law enforcement obtained sixty samples taken from individual marijuana plants, that law enforcement packaged in sixty separate envelopes (Government Exhibit 9-24A), at the address of 91 Bass Lane, Hayfork, California. On or about August 15, 2019, the DEA Western Laboratory in Pleasanton, California, received Government Exhibit 9-24A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-24A. On or about June 11, 2020, Forensic Chemist Thomas N. Teadt completed his analysis of Government Exhibit 9-24A using recognized and reliable methods. The results of that analysis are reflected in the Chemical Analysis Report for LIMS Number 2019-SFL7-04248 (Government Exhibit 9-24B). Government Exhibit 9-24B accurately summarizes Teadt's findings, namely that the net weight of the sixty samples contained in Government Exhibit 9-24A is approximately 99.1 grams, twenty-three of the sixty samples were tested, and eight of the twenty-three samples tested are marijuana, a Schedule I controlled substance.

11. On or about August 16, 2017, law enforcement obtained approximately 3.5 grams of powder material suspected to be cocaine (Government Exhibit 9-11A). On or about August 17, 2017, the Virginia Department of Forensic Science Central Laboratory in Richmond, Virginia, received Government Exhibit 9-11A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-11A. On or about January 19, 2018, Forensic Scientist Rebecca H. Masten completed her analysis of Government Exhibit 9-11A using recognized and reliable methods. The results of that analysis are reflected in the Certificate of

Analysis for FS Lab # N17-6821 (Government Exhibit 9-11B). Government Exhibit 9-11B accurately summarizes Masten's findings, namely that Government Exhibit 9-11A weighs approximately 3.83 grams including innermost packaging and contains a detectable amount of Cocaine, a Schedule II controlled substance.

12. On or about August 22, 2017, law enforcement obtained approximately seven grams of powder material suspected to be cocaine (Government Exhibit 9-12A). On or about September 5, 2017, the Virginia Department of Forensic Science Central Laboratory in Richmond, Virginia, received Government Exhibit 9-12A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-12A. On or about January 25, 2018, Forensic Scientist Melanie T. Byers completed her analysis of Government Exhibit 9-12A using recognized and reliable methods. The results of that analysis are reflected in the Certificate of Analysis for FS Lab # N17-7316 (Government Exhibit 9-12B). Government Exhibit 9-12B accurately summarizes Byers's findings, namely that Government Exhibit 9-12A weighs approximately 7.60 grams including innermost packaging and contains a detectable amount of Cocaine, a Schedule II controlled substance.

13. On or about August 24, 2017, law enforcement obtained approximately 14 grams of powder material suspected to be cocaine (Government Exhibit 9-13A). On or about September 19, 2017, the Virginia Department of Forensic Science Central Laboratory in Richmond, Virginia, received Government Exhibit 9-13A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-13A. On or about January 24, 2018, Forensic Scientist Johnnie L. Bennett, Jr. completed his analysis of Government Exhibit 9-13A using recognized and reliable methods. The results of that analysis are reflected in the

Certificate of Analysis for FS Lab # N17-7725 (Government Exhibit 9-13B). Government Exhibit 9-13B accurately summarizes Bennett's findings, namely that Government Exhibit 9-13A weighs approximately 15.54 grams including innermost packaging and contains a detectable amount of Cocaine, a Schedule II controlled substance.

14. On or about August 30, 2017, law enforcement obtained approximately 14 grams of powder material suspected to be cocaine (Government Exhibit 9-14A). On or about September 25, 2017, the Virginia Department of Forensic Science Central Laboratory in Richmond, Virginia, received Government Exhibit 9-14A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-14A. On or about January 30, 2018, Forensic Scientist Jacob Easter completed his analysis of Government Exhibit 9-14A using recognized and reliable methods. The results of that analysis are reflected in the Certificate of Analysis for FS Lab # N17-7829 (Government Exhibit 9-14B). Government Exhibit 9-14B accurately summarizes Easter's findings, namely that Government Exhibit 9-14A weighs approximately 16.36 grams including innermost packaging and contains a detectable amount of Cocaine, a Schedule II controlled substance.

15. On or about September 26, 2017, law enforcement obtained approximately one ounce of powder material suspected to be cocaine (Government Exhibit 9-15A). On or about October 24, 2017, the Virginia Department of Forensic Science Central Laboratory in Richmond, Virginia, received Government Exhibit 9-15A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-15A. On or about February 28, 2018, Forensic Scientist Erin E. Przybylski completed her analysis of Government Exhibit 9-15A using recognized and reliable methods. The results of that analysis are reflected in the Certificate of



Analysis for FS Lab # N17-8767 (Government Exhibit 9-15B). Government Exhibit 9-15B accurately summarizes Przybylski's findings, namely that Government Exhibit 9-15A weighs approximately 27.73 grams and contains a detectable amount of Cocaine, a Schedule II controlled substance.

16. On or about October 25, 2017, law enforcement obtained approximately two ounces of powder material suspected to be cocaine (Government Exhibit 9-16A). On or about November 14, 2017, the Virginia Department of Forensic Science Central Laboratory in Richmond, Virginia, received Government Exhibit 9-16A for analysis. A proper chain of custody was maintained regarding Government Exhibit 9-16A. On or about April 12, 2018, Forensic Scientist Jennifer Clary completed her analysis of Government Exhibit 9-16A using recognized and reliable methods. The results of that analysis are reflected in the Certificate of Analysis for FS Lab # N17-9407 (Government Exhibit 9-16B). Government Exhibit 9-16B accurately summarizes Clary's findings, namely that Government Exhibit 9-16A weighs approximately 54.92 grams and contains a detectable amount of Cocaine, a Schedule II controlled substance.

17. Law enforcement properly stored and maintained proper chain of custody over Government Exhibits 9-1A through 9-16A, 9-18A through 9-22A, and 9-24A.

18. This stipulation, and Government Exhibits 9-1A through 9-16A, 9-18A through 9-22A, and 9-24A, and Government Exhibits 9-5B through 9-9B, 9-11B through 9-16B, 9-18B through 9-22B, and 9-24B are admissible in evidence.

So stipulated:

ON BEHALF OF THE GOVERNMENT:


Jessica D. Aber  
United States Attorney

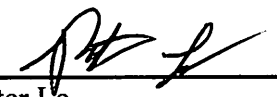
By:

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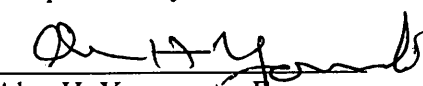
James L. Trump  
Carina A. Cuellar  
Ryan B. Bredemeier  
Assistant United States Attorneys

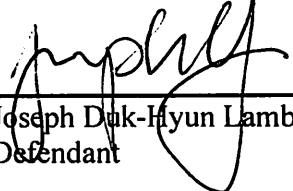
ON BEHALF OF THE DEFENDANT:

Peter Le  
By:   
Lana Manitta, Esq.  
Jesse Winograd, Esq.  
Counsel for Peter Le

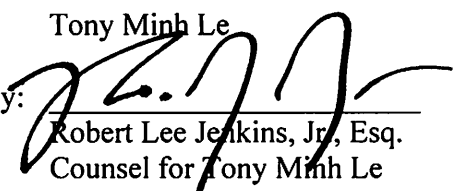
  
Peter Le  
Defendant


ON BEHALF OF THE DEFENDANT:

Joseph Duk-Hyun Lamborn  
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Pleasant Sanford Brodnax, III, Esq.  
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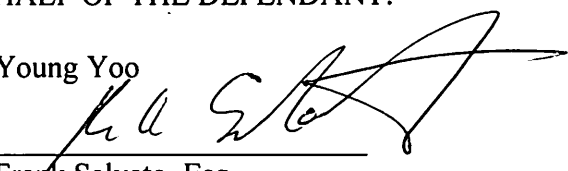
  
Joseph Duk-Hyun Lamborn  
Defendant

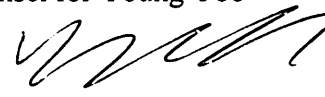
ON BEHALF OF THE DEFENDANT:


Tony Minh Le  
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Robert Lee Jenkins, Jr., Esq.  
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Tony Minh Le  
Defendant

ON BEHALF OF THE DEFENDANT:

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By:   
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Christopher Amolsch, Esq.  
Counsel for Young Yoo

  
Young Yoo  
Defendant

April 13, 2022 /s/   
Liam O'Grady  
United States District Judge